

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
EASTERN DIVISION**

POSITIVE GENERATION IN CHRIST, INC.

Plaintiff,

v.

UNITED BEHAVIORAL HEALTH, INC., and
OPTUM360, LLC,

Defendants.

Civil Action No. 4:23-CV-00191

**CONSENT MOTION FOR EXTENSION OF TIME
TO FILE RESPONSIVE PLEADING**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 6.1(a), Defendants United Behavioral Health, Inc. (“United”) and OPTUM360, LLC (“OPTUM 360”) (collectively “Defendants”) move for a thirty-day extension of time to answer or otherwise respond to Plaintiff’s Complaint (ECF No.1). Counsel for the Plaintiff consents to the requested extension. In support of their motion, Defendants state as follows:

1. Defendants were served with the Complaint and accompanying documents, via Traceable Mail, on November 22, 2023.
2. Defendants’ current deadline to respond to the Complaint is December 14, 2023.
3. Good cause exists to grant the requested extension because Defendants’ counsel requires additional time to investigate and analyze the matter in order to respond to Plaintiff’s Complaint.
4. The requested extension is not made for purpose of delay or any other improper purpose.

5. In accordance with Local Rule 6.1(a), on December 6, 2023, Defendants' counsel conferred with Plaintiff's counsel, via telephone, regarding this request for an extension. Counsel for Plaintiff consents to Defendants' requested extension.

6. The time to answer or otherwise respond to the Complaint has not passed.

7. Accordingly, Defendants respectfully request that their deadline to answer or otherwise respond to the Complaint be extended to January 13, 2024.

Respectfully submitted this 13th day of December, 2023.

ALSTON & BIRD LLP

/s/ Matthew P. McGuire

Matthew P. McGuire
N.C. State Bar No. 20048
555 Fayetteville Street, Suite 600
Raleigh, NC 27601
Telephone: (919) 862-2200
matt.mcguire@alston.com

Counsel for Defendants

CERTIFICATE OF SERVICE

This is to certify that this day, December 13, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing and effectuate service to all counsel of record in this matter.

ALSTON & BIRD LLP

/s/ Matthew P. McGuire

Matthew P. McGuire
N.C. State Bar No. 20048
555 Fayetteville Street, Suite 600
Raleigh, NC 27601
Telephone: (919) 862-2200
matt.mcguire@alston.com

Counsel for Defendants